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March 18, 2019

**EX PARTE VIA ELECTRONIC FILING**

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington DC 20554

**Re: In the Matter of Transforming the 2.5 GHz Band, WT Docket No. 18-120**

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 1.1206(b), this letter summarizes an oral presentation regarding the above-referenced proceeding made during a meeting held at the Federal Communications Commission ("FCC" or "Commission") on March 14, 2019, attended by Michael Goggin and Brian Benison representing AT&T Services, Inc. ("AT&T") and by Dana Shaffer, John Schauble, Blaise Scinto, Jonathan Campbell, Nadja Sodos-Wallace, Christiaan Segura, Nancy Zaczek and Matthew Pearl of the Wireless Telecommunications Bureau. During the meeting, AT&T encouraged the Commission to use the auction process to repurpose this spectrum. AT&T recognizes the complexity of the band (see attachment) but believes the best way to resolve the challenges is to hold both an incentive auction for existing licensees and a traditional auction for the whitespaces making this spectrum available for rapid 5G deployments. A tandem auctions approach would be a "win-win" for everyone involved, because it would give current licensees an additional option that offers them a better chance of realizing the fullest value of their licenses, without taking away any option that any party now holds. In other words, an incentive auction would merely *add* an option that EBS licensees do not already have. If any EBS licensee would want to continue its operations as before, it would be free to do so. No existing licensee would be forced to participate in the incentive auction. It merits mention, however, that an incentive auction could provide an EBS licensee an even greater opportunity than the current leasing model to fulfill its educational mission, because the incentive auction proceeds would likely be considerable.

Pursuant to the Commission's rules, a copy of this letter is being filed electronically in the above-referenced docket. Please do not hesitate to call me if you have questions.

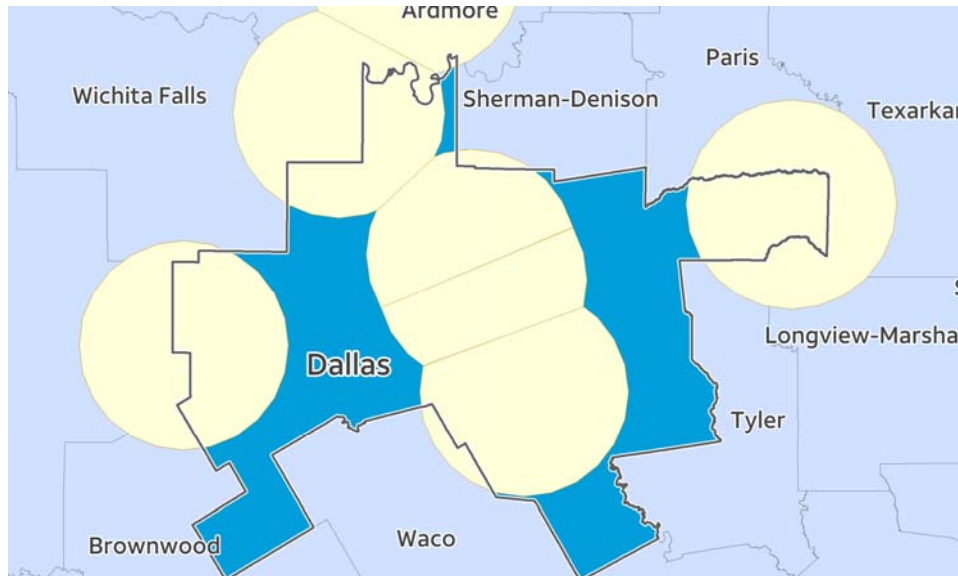
Respectfully submitted,

/s/ Brian J. Benison

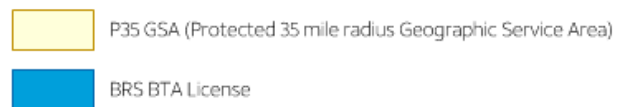
Cc: Dana Shaffer                      John Schauble  
Blaise Scinto                      Jonathan Campbell  
Nadja Sodos-Wallace              Matthew Pearl  
Christiaan Segura                  Nancy Zaczek

## Example: Dallas BTA

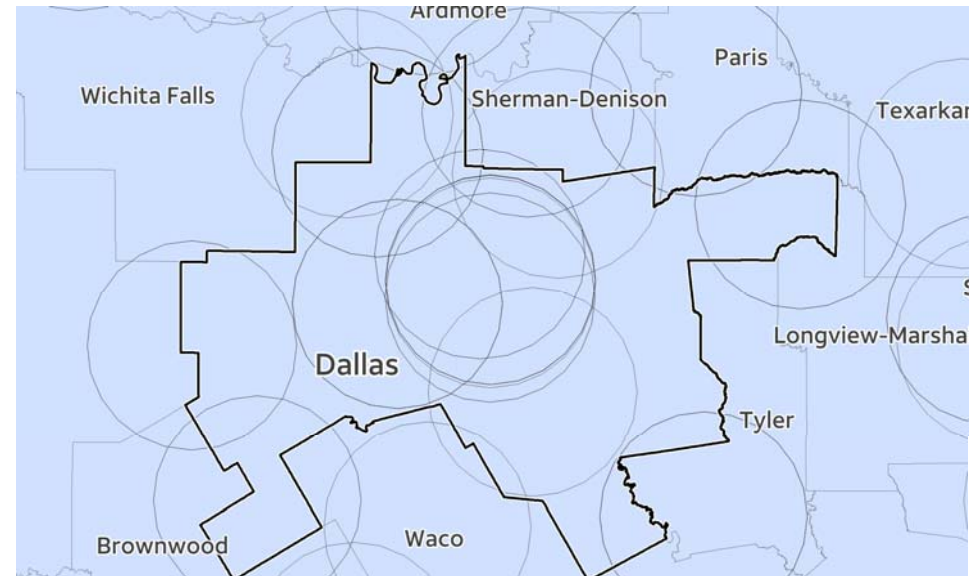
Landscape: One Channel



Multiple P35s and one partitioned BTA license



Landscape: All Channels



All the P35s in the Dallas BTA

